

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

KYMBERLY HOBBS,  
ADMINISTRATOR OF THE ESTATE  
OF CHARLES JAMES GIVENS,  
DECEASED,

Plaintiff,

**V.**

ANTHONY RAYMOND KELLY, et al.,

## Defendants.

Case No. 1:23cv00003

**NOTICE OF FILING OF PROPOSED JURY INSTRUCTIONS AND  
PROPOSED JURY VERDICT FORM**

Defendants, Anthony Kelly, Gregory Plummer, Joshua Jackson and William Montgomery, by counsel, submit the attached proposed jury instructions and proposed jury verdict form as required by the Court's Trial Order, Doc. 170.

Respectfully submitted,

ANTHONY RAYMOND KELLY  
GREGORY SCOTT PLUMMER  
JOSHUA RAY JACKSON  
WILLIAM ZACHARY MONTGOMERY

By Counsel

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By s/Cameron S. Bell  
Cameron S. Bell

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of March, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

s/Cameron S. Bell  
Cameron S. Bell